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SUSAN CUSHMAN
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
-oOo-

UNITED STATES OF AMERICA,)	No. 2:17-mj-0865-PAL
Plaintiff,)	
)	
v.)	**MOTION TO DISMISS**
)	**CRIMINAL COMPLAINT**
VICTOR NAVARRO, and ,)	
JOSE SALVADOR GONZALEZ-MILLAN,)	
)	
Defendants.)	

COMES NOW the United States of America, by and through STEVEN W. MYHRE,

Acting United States Attorney, and Susan Cushman, Assistant United States Attorney, and files this

Motion for leave to dismiss the Criminal Complaint, pursuant to Fed. R. Crim. P. 48(a). Upon review

of the entire record, the United States has determined that, in the best interests of justice, the foregoing

Criminal Complaint should be dismissed against Victor NAVARRO and Jose Salvador GONZALEZ-

MILLAN without prejudice.

       i) Defendant GONZALEZ-MILLAN is in custody on the captioned matter.

       ii) Defendant NAVARRO is on pre-trial release.

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WHEREFORE, the United States requests that this Court confer its leave, as required under Rule 48(a) of Federal Rules of Criminal Procedure, and grant this motion to dismiss the Criminal Complaint as to both defendant's without prejudice.

DATED this 6th day of September, 2017.

Respectfully Submitted,

STEVEN W. MYHRE
Acting United States Attorney

/s/ Susan Cushman

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SUSAN CUSHMAN
Assistant United States Attorney

IT IS SO ORDERED this 6th day of September, 2017.

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Peggy A. Leen
United States Magistrate Judge

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CERTIFICATE OF ELECTRONIC SERVICE

This is to certify that the undersigned has served counsel for Defendant with the foregoing by means of electronic filing.

Dated this <u>6th</u> day of September, 2017

/s/ Susan Cushman

_____

SUSAN CUSHMAN
Assistant United States Attorney